

**TECHNICAL REVIEW DOCUMENT  
FOR  
OPERATING PERMIT 98OPDL206**

to be issued to:

Delta Municipal Light and Power  
Delta County  
Facility ID 0290054

Prepared by Geoffrey Drissel  
January 6, 2004

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I. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued January 1, 1999, and expires on January 1, 2004. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted February 10, 2003, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description

This facility is an electrical generating plant defined under the standard industrial classification code of 4911. Electricity is generated with seven (7) internal combustion engines, three diesel fuel fired and four that burn diesel or a combination of diesel and natural gas (dual-fuel). The facility is located at 1133 Main Street in the city of Delta, Colorado. Delta county is designated as attainment for all criteria pollutants. There are no affected states within 50 miles

of the facility. The following Federal Class I areas are located within 100 kilometers of the facility: Weminuche Wilderness Area, Maroon Bells-Snowmass Wilderness Area, Black Canyon of the Gunnison Wilderness Area, and the West Elk Wilderness Area. The facility has certified that they are not subject to the Accidental Release provisions of section 112(r) of the Clean Air Act. Facility wide emissions are as follows:

Pollutant	All Diesel PTE (tpy)	Dual Fuel PTE (tpy)	Facility Actual (tpy)
NOx	853.94	859.40	9.5
VOC	58.45	26.61	0.26
CO	185.72	120.37	1.25
SO <sub>2</sub>	56.81	8.67	0.05
PM	61.00	11.32	0.25
PM <sub>10</sub>	58.26	10.91	0.25

Potential emissions are based on emissions calculations supplied in the operating permit application. Actual emissions are based upon inspection information for the period July 1, 2000 through June 30, 2001. This source is required to provide an updated APEN for each emission unit in the event that emissions of NOx increase 5% or 50 tons per year and/or CO or VOC increase 5 tons per year above the level reported on the last APEN submitted to the APCD.

### III. Discussion of Modifications

#### Source Requested Modifications

The source did not request any modifications to the renewal Operating Permit.

#### Other Modifications

In addition to the changes requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Delta Municipal Operating Permit. These changes are as follows:

Page following Cover Page

- Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).
- The citation (above “issued to” and “plant site location”) on the page following the cover page provides the incorrect title for the state act. The title was changed from “Colorado Air Quality Control Act” to “Colorado Air Pollution Prevention and Control Act”. In addition, the dates were removed from the citation.

Section I - General Activities and Summary

- The language in Condition 1.3 was changed based on comments made by EPA on other Operating Permits.
- The language in Condition 3.1 was revised to more appropriately address the PSD status of the source.
- Revised Section 4 that states the applicability of the Accidental Release Prevention Program (112(r)).
- Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

Section III – Permit Shield

- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements” and a new section 3 was added for subsumed (streamlined) conditions. Note that there were no streamlined conditions.
- Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance”.

- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.
- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence “Based upon the information available to the Division and supplied by the applicant.”

#### Section IV - General Conditions

- Added an “and” between the Reg 3 and C.R.S. citations in General Condition 4 (compliance requirements).
- The Common Provisions Regulation was included in General Condition 3.
- The citation in General Condition 8 (fees) was changed to cite the Colorado Revised Statue. In addition, any specific identification of a fee (i.e. \$100 APEN fee) or citation of Reg 3 was removed and replaced with the language “...in accordance with the provisions of C.R.S. § 25-7-114.7.
- The citation in General Condition 14 (odor) was corrected. In addition, the phrase “Part A” was added to the citation for Condition 14 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the Operating Permit.
- The reference in Condition 29 (volatile organic compounds) to Regulation No. 7, Section III.C.3 was corrected to Regulation No. 7, Section VIII.C.3.
- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 29.

#### Appendices

- Appendix B and C were replaced with revised Appendices.